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Attorneys for Defendants, Premier Orthopaedic and Sports Medicine Associates of Southern New Jersey, LLC, trading as Premier Orthopaedic Associates, Premier Orthopaedic Associates Surgical Center, LLC, and Kimberley Yvette Smith, M.D., a/k/a Kimberley Yvette Smith-Martin, M.D., Thomas Dwyer, M.D., Richard C. DiVerniero, M.D., John Catalano, M.D., Jeffrey Strauss, M.D.

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

IN RE NEW ENGLAND COMPOUNDING PHARMACY, INC. PRODUCTS LIABILITY LITIGATION This document relates to: All New Jersey Cases	Docket No. 1:13-md-2419-RWZ MDL No. 02419
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NOTICE OF POSTPONEMENT OF DEPOSITION

Defendants Premier Orthopaedic and Sports Medicine Associates of Southern New Jersey, LLC, trading as Premier Orthopaedic Associates, Premier Orthopaedic Associates Surgical Center, LLC, and Kimberley Yvette Smith, M.D., a/k/a Kimberley Yvette Smith-Martin, M.D., Thomas Dwyer, M.D., Richard C. DiVerniero, M.D., John Catalano, M.D., Jeffrey Strauss, M.D. give notice to the Court and to all parties of the following:

1. On or about May 15, 2015 a notice of deposition was served on counsel for the deposition of a representative of Inspira Health Network and for the

deposition of Joe Alessandrini, Inspira Health Network's Pharmacist. The depositions were noticed for June 22, 2015 and June 29, 2015 respectively [Dkt. No. 1861].

2. After a meet and confer, which occurred on June 10, 2015 the noticed parties objected to producing their witnesses on the above dates and have stated that no witnesses will be produced on either June 22, 2015 or June 29, 2015.
3. The noticing parties will be filing a motion to compel the depositions.
4. The defendants were working to resolve these objections but it is now necessary to resort to motion practice.
5. In light of the above the Premier Defendants hereby give notice to the Court and all parties that the depositions of a Representative of Inspira Health Network according to F.R.C.P. 30(b)(6) and Joe Alessandrini, are hereby postponed until the resolution of the above referenced objections and until the resetting of these depositions.

Respectfully submitted,

Blumberg & Wolk, LLC
Attorneys for: Premier Orthopaedic and
Sports Medicine Associates of Southern
New Jersey, LLC, trading as Premier
Orthopaedic Associates, Premier
Orthopaedic Associates Surgical Center,
LLC, and Kimberley Yvette Smith, M.D.,
a/k/a Kimberley Yvette Smith-Martin, M.D.,
et al

By: /s/Christopher M. Wolk

Christopher M. Wolk, Esq
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CERTIFICATE OF SERVICE

I, Christopher M. Wolk, hereby certify that this document has been filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this date.

Date: June 17, 2015

/s/ Christopher M. Wolk_____